

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: 120 Broadway entities and Silverstein Properties
c/o Lissa C. Gipson, Esq. and Thomas A. Egan, Esq.
Flemming Zulack Willaimson Zauderer LLP
One Liberty Plaza
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PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 120 Broadway, as referenced in the deposition of James Halpin, on June 13th, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

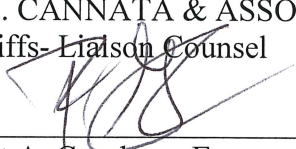
1. Fire Alarm System Printer Record created on September 11th, 2001, specifically: Any documents from September 11th, 2001 from the fire alarm system and/or printer, indicating whether or not and if so, when the fire alarm system was triggered on that day, as requested on or about page 49 in the above referenced deposition.
2. Any records and/or evidence indicating any A/C detectors' detection of any substances including but not limited to dust and particles of combustion; any records and/or data generated to indicate if any HVAC system was shut down as a result of an A/C detector, as requested on or about page 50 in the above referenced deposition.

3. Fire Alarm Announcement Records, including but not limited to any documentation and/or data indicating an announcement made in conjunction with the fire alarm system including the time and/or substance; any logs and/or documentation maintained by the building or by any employee working at this building indicating the shutting down of the HVAC system on each individual floor, as requested on or about page 54 in the above referenced deposition.
4. List of full Engineering and Security Staff working at 120 Broadway at 9/11 and for 6 months following the events of 9/11, including if still within your employ and if not, last known address, as requested on or about page 181 in the above referenced deposition.
5. Tenant listing and/or any document indicating all the tenants as of September 11th and for 6 months following, as requested on or about page 243 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: 
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